UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA) Case No. 21-CR-10256-RWZ
v.)
KINGSLEY R. CHIN, ADITYA HUMAD, and SPINEFRONTIER, INC.,))
Defendants)

DEFENDANT KINGSLEY CHIN'S ASSENTED-TO MOTION TO FILE JOINT MEMORANDUM UNDER SEAL

On September 20, 2021, following Defendant Kingsley Chin's arraignment, the Court ordered the parties to file a joint memorandum no later than September 27, 2021, concerning whether they have agreed on conditions of release. Dr. Chin respectfully moves for leave to file that joint memorandum under seal. Sealing is appropriate because the joint memorandum details financial, marital, and other personal information that normally is disclosed only to the United States Probation Office, the parties, and the Court in connection with the setting of conditions of release, and is not normally spread on the public record.

The government has authorized counsel to state that the government assents to this motion.

Respectfully submitted

/s/ William W. Weinreb

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Date: September 27, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed today through the Court's ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that paper copies will be sent by U.S. Mail to those indicated as non-registered participants on September 27, 2021.

/s/ William D. Weinreb
William D. Weinreb